

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Criminal No. — CR 22-100 SRN/ECW

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2261A(2)(A)

18 U.S.C. § 2261A(2)(B)

v.

18 U.S.C. § 875(c)

18 U.S.C. § 912

JULYEN ALONZO MARTIN,

Defendant.

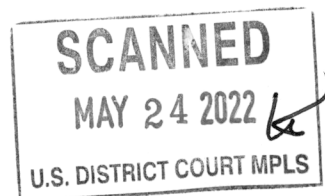
THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Cyberstalking)

From in or about September 2020, through in or about December 2021, in the State and District of Minnesota and elsewhere, Defendant,

JULYEN ALONZO MARTIN,

with the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, to wit, victim T.A., did use interactive computer services, electronic communication services, electronic communications systems of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that placed T.A., a member of T.A.'s immediate family, or a spouse or intimate partner of T.A. in reasonable fear of death or serious bodily injury; or caused, attempted to cause, or would be reasonably expected to cause T.A., a member of T.A.'s immediate family, or a spouse or intimate partner of T.A. substantial emotional distress, all in violation of Title 18, United States Code, Sections 2261A(2)(A)–(B).



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COUNT 2
(Cyberstalking)

From in or about September 2020, through in or about January 2021, in the State and District of Minnesota and elsewhere, Defendant,

JULYEN ALONZO MARTIN,

with the intent to harass, intimidate, or place under surveillance with intent to harass or intimidate another person, to wit, victim J.L., did use interactive computer services, electronic communication services, electronic communications systems of interstate commerce, and other facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, or would be reasonably expected to cause J.L., a member of J.L.'s immediate family, or a spouse or intimate partner of J.L. substantial emotional distress, all in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNTS 3-5
(Interstate Transmission of a Threat To Injure Person of Another)

From on or about the dates set forth below, in the State and District of Minnesota and elsewhere, Defendant,

JULYEN ALONZO MARTIN,

did knowingly and willfully, that is, with the intent to communicate a true threat and with knowledge that it would be viewed as a true threat, transmit in interstate or foreign commerce a communication containing a threat to injure the person of another, to wit, MARTIN sent messages containing threats to injure victims T.A. and J.L., specifically:

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Count	Type of Electronic Transmission in Interstate or Foreign Commerce	Approx. Date of Threat
3	Written communication via messaging application TextNow, stating, in part, "And I'm going to beat [J.L.'s] ass inside his [workplace]. Cause believe it or not I'm in [J.L.'s state] right now. I've watched him go in and out [J.L.'s workplace] for a week. And the only reason he is still walking is because Im letting him continue to breath. . . . I'm afraid he might die if I hit him too hard."	On or about September 14, 2020
4	Written communication via Facebook Messenger, stating, in part, to T.A., "I will fuck up your life as long as I live. Someone better come kill me right now. Before I kill somebody. You know what I want to do. I'm tired of calling people."	On or about June 5, 2021
5	Written communication via Facebook Messenger stating, in part, to T.A., "FUCK YOU. GIVE ME [I.M.] OR YOUR LIFE IS OVER."	On or about September 8, 2021

all in violation of Title 18, United States Code, Section 875(c).

COUNT 6

(Impersonating an Officer of the United States)

From on or about October 1, 2020, through on or about October 16, 2020, in the State and District of Minnesota and elsewhere, Defendant,

JULYEN ALONZO MARTIN,

did pretend to be, held himself out as, and acted as if he were, an officer and employee acting under the authority of the United States, specifically, as a law enforcement officer with the Federal Bureau of Investigation. MARTIN was not an officer or employee acting under the authority of the United States during this time, a fact of which he was aware. Furthermore, while so pretending, MARTIN acted with the intent to cause an organization

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and individuals to follow a course of action and inaction, all in violation of Title 18, United States Code, Section 912.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON